

RE: EPA Review of "Sampling and Analysis Plan for Trenches 31 and 34 of the 218-W-5 Burial Ground," HNF-23614, Revision 0

Dave Bartus to: Conaway, Kathy (ECY)

04/25/2011 01:01 PM

Not at all - exactly my intention in preparing the comments and sharing them with Ecology. I'm currently working on revising the comments to reflect Revision 1 of the sampling and analysis plan. Let me get you and Lorna Goodnight the revised comments, then you can share as you see fit.

"Conaway, Kathy (ECY)" Dave, do you have any problems sharing...

04/25/2011 12:27:44 PM

From: "Conaway, Kathy (ECY)" < KCON461@ECY.WA.GOV>

To: Dave Bartus/R10/USEPA/US@EPA

Date: 04/25/2011 12:27 PM

Subject: RE: EPA Review of "Sampling and Analysis Plan for Trenches 31 and 34 of the 218-W-5 Burial

Ground," HNF-23614, Revision 0

Dave, do you have any problems sharing these comments with ETF/LERF? It seems to me some of these comments are relevant to the permit process and they need to know it.

----Original Message----

From: Bartus.Dave@epamail.epa.gov [mailto:Bartus.Dave@epamail.epa.gov]

Sent: Monday, April 18, 2011 11:10 AM

To: Skinnarland, Ron (ECY); Singleton, Deborah (ECY)

Cc: Conaway, Kathy (ECY)

Subject: EPA Review of "Sampling and Analysis Plan for Trenches 31 and 34 of

the 218-W-5 Burial Ground," HNF-23614, Revision 0

Ron and Deb:

I've completed a first-pass review of the document HNF-23614 provided during the Hanford inspection of Trenches 31 and 34. I've reviewed the document from both a technical perspective, and as it relates to the existing Dangerous Waste component of the Hanford RCRA permit. I've previously provided these comments to the NEIC inspection team for their consideration in their inspection report, but would also like to provide them to Ecology directly regarding on-going program implementation and Ecology follow-up.

While the facility is managing the Trench 31/34 leachate collection activities under the generator accumulation standards of WAC 173-303-200, there is a clear nexus to permit requirements, as information concerning Trench 31/34 leachate collected under this WAP can reasonably be expected to be used to satisfy LERF/ETF waste acceptance criteria. As you can see from the comments, there are both technical concerns with the waste analysis requirements, and disconnects between analysis conducted under this WAP, and waste acceptance requirements in the dangerous waste permit.

I'll be happy to provide further assistance with any questions you may have.

Dave

(See attached file: EPA Region 10 Review Comments LERF ETF Leachate Sampling and Analysis Plan.docx)